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CEEK VR, INC.
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 ANTHONY C. LUSTIG,

13 Plaintiff,

14 v.

15 AZGEN SCIENTIFIC HOLDINGS PLC,

16 Defendant.
17

Case No. 18-CV-07503-HSG

**DECLARATION OF MARY SPIO
IN SUPPORT OF
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

18 I, Mary Spio, hereby declare as follows:

19 1. I am the founder and Chief Executive Officer of CEEK VR, Inc. ("CEEK"). I
20 have first-hand knowledge of the facts in this declaration. If called as a witness, I could and
21 would testify competently to these facts.

22 2. I submit this declaration in support of Plaintiff Anthony C. Lustig's administrative
23 motion to file under seal. (Dkt. No. 48, filed November 18, 2019.) I have reviewed the
24 Declaration of CEEK VR, Inc., which was designated as confidential by CEEK, and which
25 Plaintiff filed provisionally under seal. For the reasons discussed below, CEEK respectfully
26 requests that the Court seal from the public record the declaration of non-party CEEK, as well as
27 any references to that declaration in Plaintiff's Notice of Motion for Entry of Default Judgment,
28 Memorandum of Points & Authorities in Support Thereof.

1 3. The Declaration of CEEK VR, Inc. contains sensitive financial and business
2 information of CEEK. This information includes confidential details regarding CEEK's equity
3 financing, shareholder equity, and future business plans. CEEK treats this information as
4 confidential and does not make this information available publicly during the normal course of its
5 business. CEEK views this information as commercially sensitive and believes that the release of
6 this information to the public would harm CEEK's competitive standing.

7 4. CEEK goes to great lengths to maintain the confidentiality of this information.
8 This includes both technological barriers to third-party access to this information, and entry into
9 confidentiality agreements with recipients of the information. The provision of the declaration of
10 CEEK to Plaintiff was conditioned on the existence of a Protective Order in this action and
11 Plaintiff's agreement to treat the declaration as confidential under the Protective Order.

12
13 I declare under penalty of perjury under the laws of the United States that the foregoing is true
14 and correct.

15 Executed on November 20, 2019

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19 By: _____

Mary Spio

Chief Executive Officer, CEEK VR, Inc.